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DASAGROUP HOLDINGS CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JEFFERIES FUNDING, LLC,

Plaintiff,

v.

DASAGROUP HOLDINGS CORP. (d/b/a
KICKHASS AVOCADOS) and LONDON
FRUIT, INC.,

Defendants.

Case No. 3:24-cv-05639-TLT

**REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF DEFENDANT
DASAGROUP HOLDING CORP. TO
DISMISS FIRST AMENDED
COMPLAINT**

[Fed. R. Civ. P. 12(b)(6);
Fed. R. Evid. 201(b)]

DASAGROUP HOLDINGS CORP. (d/b/a
KICKHASS AVOCADOS),

Counter- and Cross-Claimant,

v.

JEFFERIES FUNDING, LLC,

Counter-Defendant,

and LONDON FRUIT, INC.,

Cross-Defendant

Date: Nov. 11, 2025

Time: 2:00 p.m.

Courtroom: 9

Judge: Hon. Trina L. Thompson

Pursuant to Federal Rule of Evidence 201, Defendant/Counterclaimant Dasagroup Holdings Corp. (“Dasagroup”), respectfully requests that the Court take judicial notice of the following materials in opposition to the motion to dismiss filed by Jefferies Financial, LLC:

MATERIALS TO BE JUDICIALLY NOTICED

- Attached hereto as **Exhibit A** is a true and correct copy of a Washington State Department of Licensing, Uniform Commercial Code Debtor Information Search Report, retrieved from the official website of the Washington Secretary of State on August 14, 2025.
- Attached hereto as **Exhibit B** is a true and correct copy of a Feb. 28, 2023 UCC-1 Financing Statement No. 2023-059-5032-9 filed with the Washington State Department of Licensing on behalf of Silo Technologies, Inc., which asserts a security interest in, among other things, the following assets of Defendant Dasagroup Holdings Corp.: “[a]ll accounts and accounts receivable of Debtor, wherever located or situated and whether now existing or arising in the future, and whether now owned or at any time in the future acquired by Debtor. . . .”
- Attached hereto as **Exhibit C** is a true and correct copy of an Oct. 24, 2024 UCC Financing Statement Amendment filed with the Washington State Department of Licensing on behalf of JFUN AR I LLC, which states a change in the “secured party of record” concerning Initial Financing Statement File No. 2023-059-5032-9, which is the initial filing statement described in the preceding paragraph.

ARGUMENT

In ruling on a motion to dismiss, the Court may consider matters subject to judicial notice under Fed. R. Evid. 201 and documents incorporated in the complaint by reference. *See Khoja v. Orexigen Therapeutics, Inc.*, 899 F.3d 988, 998 (9th Cir. 2018); *Lee v. City of Los Angeles*, 250 F.3d 668, 688–89 (9th Cir. 2001).

Under Federal Rule of Evidence 201(b), a court may take judicial notice of a fact that is “not subject to reasonable dispute” either because it is “generally known within the trial court’s territorial jurisdiction” or because it “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b). Federal courts

1 routinely take judicial notice of state corporate records and state UCC filings. *See, e.g., Arnold*
 2 *v. Bay Fin. Co. LLC No. 1:21-cv-1182 JLT SKO*) 2023 U.S.Dist.LEXIS 27890, at *10 (E.D.Cal.
 3 Feb. 17, 2023) (granting request for judicial notice of documents in county official records
 4 including a UCC-1 financing statement); *McKeon Law Grp., LLC v. Braindard*, 2021 Bankr.
 5 LEXIS 489, at *7-8 (Bankr.D.Conn. Mar. 3, 2021) (“The court will take judicial notice of the
 6 copy of the UCC-1 Financing Statement filed with the Connecticut Secretary of State. The
 7 Connecticut Secretary of State's records are publicly available online and the sort of records that
 8 are readily determinable.”); *J&J Sports Prods. v. La Parranda Mexicana Bar & Restaurante Co.*,
 9 2018 U.S.Dist.LEXIS 199659, at *3, n 3 (E.D.N.Y. Apr. 9, 2018) (judicial notice of state
 10 corporate filings). The same rationale applies here, and the Court should take judicial notice of
 11 the attached UCC materials about Dasagroup attached hereto that were obtained from the
 12 Washington State Department of Licensing.

12 CONCLUSION

13 The Court should grant this request for judicial notice.

14
15
16
17 DATED: Aug. 20, 2025

Respectfully submitted,

MOYA LAW FIRM

/s/ Mario A. Moya

19 _____
Mario A. Moya

20
21 Attorneys for Defendant/Counterclaimant
DASAGROUP HOLDINGS CORP.

EXHIBIT A

Washington State Department of Licensing
Uniform Commercial Code
Debtor Information Search Report

Search number: 2025-226-8386-4S

Name as provided:

Organization: Dasagroup Holdings Corp. (Debtor)

Name searched:

Organization: DASAGROUPHOLDINGS

Lien type searched: All

Lien status searched: All

Search limited by:

Search logic used: Standard

Report: 8/14/2025 1:57:48 PM

Through date: 8/13/2025

Copies:

Certification:

The filing office certifies that the attached list (and copies, if any) is a true and exact representation of all financing statements and non-UCC liens for the name searched, as filed with the Department of Licensing, Uniform Commercial Code Program, as of the through date shown above. But a limited search may not reveal all records of the name searched and the searcher bears the risk of relying on such a search.



A handwritten signature in black ink, reading "Marcus J. Glasper".

Marcus J Glasper, Director

1 of 1

Initial Financing Statement File Number: 2023-059-5032-9

Date and time filed: 2/28/2023 12:39:00 PM

Lapse date: 02/28/2028

(D) DASAGROUP HOLDINGS CORP
1140 N 192ND ST APT 505
Shoreline, WA 98133 USA

(S) Silo Technologies Inc
8605 Santa Monica Blvd
West Hollywood, CA 90069 USA

History:

Type of Record	Date & Time Filed	File#	#PGS
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Initial	2/28/2023 12:39:00 PM	2023-059-5032-9	1
Amendment	10/24/2024 11:03:00 AM	2024-298-6680-3	1

(Change secured party)

Current Name

Silo Technologies Inc

Secured Party

JFUN AR I LLC
520 Madison Avenue New York NY 10022 USA

Authorizing Party

JFUN AR I LLC

EXHIBIT B

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Corporation Service Company 1-800-858-5294
B. E-MAIL CONTACT AT FILER (optional) WAFilings@cscinfo.com
C. SEND ACKNOWLEDGMENT TO: (Name and Address) Corporation Service Company 801 Adlai Stevenson Drive Springfield, IL 62703 USA

Date of Filing : 02/28/2023**Time of Filing : 12:39:00 PM****File Number : 2023-059-5032-9****Lapse Date : 02/28/2028****THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY**

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

1a. ORGANIZATION'S NAME DASAGROUP HOLDINGS CORP				
OR				
1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)		SUFFIX
1c. MAILING ADDRESS 1140 N 192ND ST APT 505	CITY Shoreline	STATE WA	POSTAL CODE 98133	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME				
OR				
2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)		SUFFIX
2c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME Silo Technologies Inc				
OR				
3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)		SUFFIX
3c. MAILING ADDRESS 8605 Santa Monica Blvd	CITY West Hollywood	STATE CA	POSTAL CODE 90069	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:

All accounts and accounts receivable of Debtor, wherever located or situated and whether now existing or arising in the future, and whether now owned or at any time in the future acquired by Debtor, together with all proceeds and monies due or becoming due on such accounts each as defined in Article 9 of the Uniform Commercial Code; all guaranties, insurance, and security for such accounts; all security reserves related to such Accounts; all of the Debtor's rights and interests in the goods giving rise to such accounts, including any and all related insurance; all of the Debtor's chattel papers, instruments, general

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, item 17 and Instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

6b. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☐ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licenser

8. OPTIONAL FILER REFERENCE DATA:

2505 49299 - 250549299

Continuation of section 4 collateral

4. This FINANCING STATEMENT covers the following collateral:

intangibles, securities and contract rights including those associated with the accounts or purchase order contracts of Debtor, all equipment, inventory, and deposit accounts; all proceeds of any of the foregoing accounts, rights and interests; and any Commercial Tort Claim that Seller may come to have and that is subsequently specifically referenced by written amendment.

EXHIBIT C

UCC FINANCING STATEMENT AMENDMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Corporation Service Company1-800-858-5294
B. E-MAIL CONTACT AT FILER (optional) WAFilings@cscinfo.com
C. SEND ACKNOWLEDGMENT TO: (Name and Address) CSC 801 Adlai Stevenson Drive Springfield, IL 62703 USA

Date of Filing : 10/24/2024**Time of Filing : 11:03:00 AM****File Number : 2024-298-6680-3****Lapse Date : 02/28/2028****THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY**

1a. INITIAL FINANCING STATEMENT FILE NUMBER

2023-059-5032-91b. ☐ This FINANCING STATEMENT AMENDMENT is to be filed [for record]

(or recorded) in the REAL ESTATE RECORDS

Filer: attach Amendment Addendum (Form UCC3Ad) and provide Debtor's name in item 132. ☐ **TERMINATION:** Effectiveness of the Financing Statement identified above is terminated with respect to the security interest(s) of Secured Party authorizing this Termination Statement3. ☐ **ASSIGNMENT** (full or partial): Provide name of Assignee in item 7a or 7b, and address of Assignee in item 7c and name of Assignor in item 9
For partial assignment, complete items 7 and 9 and also indicate affected collateral in item 84. ☐ **CONTINUATION:** Effectiveness of the Financing Statement identified above with respect to the security interest(s) of Secured Party authorizing this Continuation Statement is continued for the additional period provided by applicable law5. ☒ **PARTY INFORMATION CHANGE:**Check one of these two boxes:AND Check one of these three boxes to:This Change affects ☐ Debtor or ☒ Secured Party of record ☒ CHANGE name and/or address: Complete item 6a or 6b; and item 7a or 7b and item 7c ☐ ADD name: Complete item 7a or 7b, and item 7c ☐ DELETE name: Give record name to be deleted in item 6a or 6b6. **CURRENT RECORD INFORMATION:** Complete for Party Information Change - provide only one name (6a or 6b)

6a. ORGANIZATION'S NAME

Silo Technologies Inc

OR	6b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
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7. **CHANGED OR ADDED INFORMATION:** Complete for Assignment or Party Information Change - provide only one name (7a or 7b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name)

7a. ORGANIZATION'S NAME

JFUN AR I LLC

OR	7b. INDIVIDUAL'S SURNAME
	INDIVIDUAL'S FIRST PERSONAL NAME
	INDIVIDUAL'S ADDITIONAL NAME(S)/INITIAL(S)
	SUFFIX

7c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
520 Madison Avenue	New York	NY	10022	USA

8. ☐ **COLLATERAL CHANGE:** Also check one of these four boxes: ☐ ADD collateral ☐ DELETE collateral ☐ RESTATE covered collateral ☐ ASSIGN collateral
Indicate collateral:9. **NAME OF SECURED PARTY OF RECORD AUTHORIZING THIS AMENDMENT:** Provide only one name (9a or 9b) (name of Assignor, if this is an Assignment)If this is an Amendment authorized by a DEBTOR, check here ☐ and provide name of authorizing Debtor

9a. ORGANIZATION'S NAME

JFUN AR I LLC

OR	9b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
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10. **OPTIONAL FILER REFERENCE DATA:****1661589**